

**AFFIDAVIT**

Your Affiant, Kenneth Garling, deposes and states:

1. I am a Task Force Officer with the Bureau of Alcohol, Tobacco, Firearms and Explosives ("ATF"), United States Department of Justice, and have been so employed since April 2018. Prior to becoming a Task force Officer with ATF, I am also a Police Officer with the Youngstown Police Department and have been so employed since July 2013. I completed the Ohio Peace Officer Training Academy (OPOTA) at Youngstown State University and have a Bachelor's Degree in Criminal Justice from Youngstown State University. I have also conducted and participated in numerous investigations involving firearms and narcotics.

**PROBABLE CAUSE**

2. On December 29, 2019, YPD Officers Carlo Eggleston Jr., Officer Thomas Wisener, and Officer Jacob Short were sent via YPD Radio to 859 East Avondale Avenue in Youngstown, Ohio in reference to a burglary in progress. YPD Radio advised the responding units the suspect was a black male wearing all black clothing.

3. Officer Short made contact with the 911 caller/victim, Kelly Strosnider. Strosnider advised Officer Short an unknown black male attempted to make entry into her home via a bedroom window.

4. Officer Eggleston Jr. and Officer Wisener discovered an individual matching the given description walking northbound on Zedaker Street near East Avondale Avenue. As Officers attempted to make contact with the subject he fled Eastbound through the yards. Officer Wisener apprehended the subject, later identified as Brandon JONES, behind the fence of 3115 Zedaker Street. Officer Eggleston found a Jennings, Model J-22, .22 caliber pistol, bearing serial number 316801 and a Colt, model Officers Model Match, .38 special caliber revolver,

bearing serial number 915604 on the ground just on the other side of the fence where JONES was apprehended. Ammunition matching that of the Colt Revolver was found on JONES' person.

5. The firearms were handled in a manner to preserve DNA Evidence by YPD Crime Lab. YPD Crime Lab secured samples of DNA off of the firearms and submitted the samples to the Ohio Bureau of Criminal Identification and Investigation (BCI) on January 16, 2020. Officers queried the serial number of the firearms on scene through YPD Index and revealed no record for stolen or lost for either.

6. The investigation revealed the window JONES attempted to make entry through was to the bedroom belonging to Strosnider's fifteen year old daughter Makayla Barber. Officers spoke to Barber who stated she observed JONES holding a black handgun and attempting to come through the window.

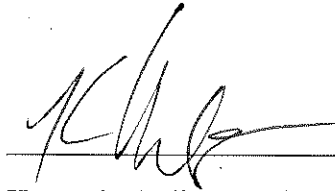
7. On February 18, 2020, BCI made a preliminary association using Ohio's State DNA Index System (SDIS) between the samples taken from the firearms and JONES.

8. JONES has previously been convicted in 2018 for Domestic Violence (F-4) in Mahoning County, Ohio Common Pleas Court case number 17CR1067 and was present at the time of his sentencing. This is a felony offense punishable by more than one year in prison. As such, he cannot possess a firearm or ammunition.

9. The Jennings and Colt firearms were not manufactured in the State of Ohio and, therefore, traveled in and affected interstate commerce before JONES possessed it.

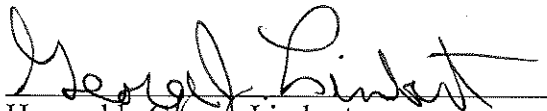
**CONCLUSION**

10. Based upon the above listed facts and circumstances, I believe and assert that there is probable cause to believe that Brandon Jamal JOHNSON, did knowingly possess a firearm and ammunition in violation of Title 18 U.S.C. Section 922(g)(1), and requests that a warrant be issued for his arrest.



Kenneth Garling, Task Force Officer  
Bureau of Alcohol, Tobacco, Firearms and  
Explosives

Sworn to and subscribed before me this 5 day of March 2020.



Honorable George Limbert  
United States Magistrate Judge  
Northern District of Ohio  
Eastern Division